

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA**

WINFRED MUCHIRA,

Plaintiff,

vs.

HALAH AL-RAWAF,  
IBRAHIM AL-RASHOUDI,  
FAHAD AL-RASHOUDI,  
LULUH AL-RASHOUDI,  
10686 Waterfalls Lane  
Vienna, VA 22182  
Fairfax County

Defendants.

Civil Action No. 1:14-cv-00770-AJT-JFA

**JURY TRIAL DEMANDED**

**PLAINTIFF WINFRED MUCHIRA'S OBJECTIONS  
TO DEFENDANTS' TRIAL EXHIBITS**

<b>Trial Exhibit Number</b>	<b>Document Description</b>	<b>Bates Range</b>	<b>Plaintiff's Objections</b>
1	Contract dated 6/7/2012 with Winfred Muchira	Muchira 0001094 - Muchira 0001096	
2	Contract dated 12/21/2012 with Winfred Muchira	Alrawaf 000001 - Alrawaf 000002	A(901); F
3	Airline ticket for Winfred Muchira from the United States to Kenya	Muchira 0001089	ID; A(901); I; F; R(402); H(802)
4	Chart of payments to Winfred Muchira		ID; A(901); F
5	Lease for 10686 Water Falls Lane	Alrawaf 000025 - Alrawaf 000036	R(402); H(802); A(901); F

6	Photos of 10686 Water Falls Lane	Muchira 795, 840 - 842, 851 - 852, 905, 855 - 856, 865, 885 - 891, 893 - 895, 897, 901 - 902, 904, 992, 1000	ID and R(402) as to Muchira-1000
7	Polaris Call Notes	POL_Muchira 501- POL_Muchira 517	F; A(901); H(802)
8	Facebook messages from account Winfred.Muchira.3		H(802); R(402); P(403)
9	Facebook posts from account Winfred.Muchira.3	Muchira 000170 - Muchira 000529	H(802); R(402); P(403)
10	Translations of Facebook posts from account Winfred.Muchira.3	Muchira 000170 - Muchira 000529_EN	H(802); R(402); P(403); F; A(901)
11	Facebook posts from account of Winfred.Muchira.3 with full comments	Muchira 001919 - Muchira 002346	H(802); R(402); P(403)
12	All cell phones produced by Winfred Muchira		R(402); C(403); P(403)
13	Reports on cell phones used by Winfred Muchira (specific portions to be identified and supplemented as Trial Exhibits)		Copies of these exhibits were not exchanged. Plaintiff objects to the exhibits based on the failure to exchange according to the court's schedule. In addition, plaintiff makes the following objections: R(402); H(802); A(901); P(403); F. Plaintiff reserves further objections should the court allow the defendants to provide copies of the exhibits out of time.

14	Any Exhibits identified by Plaintiff		By placing a document on her exhibit list, plaintiff does not waive any objection to that document's introduction into evidence by defendants. Plaintiff objects to any attempt by defendant to introduce an exhibit into evidence on the basis that the exhibit appears on plaintiff's exhibit list.
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**OBJECTION KEY FOR EXHIBITS**

<b>Code</b>	<b>Objection</b>
<b>A (901) Authenticity.</b>	Plaintiff objects to this exhibit on the ground that it is not what it purports to be. (Fed. R. Evid. 901 & 902)
<b>C (403) Cumulative.</b>	Plaintiff objects to this exhibit because it needlessly presents cumulative evidence. (Fed. R. Evid. 403)
<b>F Lack of Foundation.</b>	Plaintiff objects to this exhibit because the foundation necessary for its admission has not been laid and is not laid in the exhibit itself. (Fed. R. Evid. 104(b))
<b>H (802) Hearsay.</b>	Plaintiff objects to this exhibit because it constitutes or contains hearsay. (Fed. R. Evid. 801-802)
<b>I (106) Incomplete.</b>	Plaintiff objects to this exhibit because the exhibit, as submitted, does not contain the complete document. (Fed. R. Evid. 106). Plaintiff reserves all other objections.
<b>ID Inaccurate Description.</b>	Plaintiff objects to this exhibit because it has an inaccurate description. Plaintiff reserves all other objections.
<b>P (403) Unfair Prejudice.</b>	Plaintiff objects to this exhibit because its probative value is substantially outweighed by the danger of unfair prejudice and/or confusion of the issues. (Fed. R. Evid. 403)
<b>R (402) Relevance.</b>	Plaintiff objects to this exhibit because it is not relevant to any issue to be decided in this case. (Fed. R. Evid. 401 & 402)

In addition to the above-stated objections to exhibits, plaintiff objects to the following witnesses who appeared on defendants' witness list filed January 14, 2015, but were not listed in defendants' initial disclosures: A. Ahmed; D. Durgana; J. Smith; and John/Jane Doe (Polaris Representative).

DATED this 25 day of January, 2015.

By: /s/ Deborah Anne Yates  
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*Counsel for Plaintiff*

**CERTIFICATE OF SERVICE**

I certify that today, January 25, 2015, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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